

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

FRANK M. FLANSBURG III, ESQ., Nevada Bar No. 6974
fflansburg@bhfs.com
MAXIMILIEN D. FETAZ, ESQ., Nevada Bar No. 12737
mfetaz@bhfs.com
EMILY L. DYER, ESQ., Nevada Bar No. 14512
edyer@bhfs.com
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

AARON F. MINER, ESQ. (*pro hac vice*)
Aaron.Miner@arnoldporter.com
SASHA ZHENG, ESQ. (*pro hac vice*)
Sasha.Zheng@arnoldporter.com
ANDREW C. JOHNSON, ESQ. (*pro hac vice*)
Andrew.Johnson@arnoldporter.com
KELLEY CHANGFONG-HAGEN, ESQ. (*pro hac vice*)
Kelley.Changfong-Hagen@arnoldporter.com
AIDAN MULRY, ESQ. (*pro hac vice*)
Aidan.Mulry@arnoldporter.com
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: 212.836.7811

Attorneys for Plaintiff HF Foods Group, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HF FOODS GROUP INC., a Delaware
corporation,

Plaintiff,

v.

MAODONG XU; ZHOU MIN NI; FAI
LAM, in his capacity as Trustee of THE
IRREVOCABLE TRUST FOR
RAYMOND NI; WEIHUI KWOK; and
YUANYUAN WU,

Defendants.

CASE NO.: 2:23-cv-00748-GMN-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR DEFENDANT YUANYUAN
WU TO ANSWER OR RESPOND TO
PLAINTIFF'S COMPLAINT**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff HF Foods Group Inc. ("Plaintiff"), through its counsel of record Brownstein Hyatt Farber Schreck and Arnold & Porter Kaye Scholer LLP and Defendant Yuanyuan Wu ("Ms. Wu"), through her counsel of record,

1 Sklar Williams PLLC, as follows:

2 1. On May 11, 2023, Plaintiff filed its Complaint for Damages and Declaratory and
3 Injunctive Relief for Violations of Federal Securities Laws against Defendants. ECF 2.

4 2. On or about May 17, 2023, Plaintiff served the Summons and Complaint on Ms.
5 Wu. ECF 42.

6 3. On June 5, 2023, Defendants Fai Lam, in his capacity as Trustee of The Irrevocable
7 Trust for Raymond Ni (“Mr. Lam”), Weihui Kwok (“Mr. Kwok”), and Ms. Wu moved for a 30-
8 day extension to respond to the Complaint, which the Court granted. ECF 44-45.

9 4. Thereafter, the Parties expressed a mutual desire to engage in good faith settlement
10 discussions.

11 5. As with certain other Defendants, Ms. Wu changed counsel and retained counsel,
12 necessitating additional time to respond to the Complaint, which Plaintiff has accommodated.

13 6. On August 15, 2023, Defendants Zhou Min Ni (“Mr. Ni”), Maodong Xu (“Mr. Xu”),
14 Mr. Lam, and Mr. Kwok stipulated to extend the deadline for Defendants to respond to the
15 Complaint by approximately 60 days in order to further the Parties’ settlement discussions and to
16 coordinate Defendants’ response deadline should the Parties not settle.

17 7. Thereafter, Ms. Wu retained counsel.

18 8. Accordingly, pursuant to LR IA 6-1(a), the Parties wish to extend the deadline for
19 Ms. Wu to respond to the Complaint by approximately 60 days in order to further the Parties’
20 settlement discussions and to coordinate all Defendants’ response deadline should the Parties not
21 settle.

22 9. No discovery deadlines or dates for trial have been set.

23 10. Accordingly, the Parties stipulate and agree that Ms. Wu shall have up to and
24 including October 10, 2023 within which to file her responses to Plaintiff’s Complaint.

25 11. This stipulation is brought in good faith by the parties and not for purposes of delay.

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28 ...

12. This is the Parties' second request to extend Ms. Wu's response deadline.¹

IT IS SO STIPULATED.

DATED this 16th day of August 2023.

DATED this 16th day of August 2023.

**BROWNSTEIN HYATT
FARBER SCHRECK, LLP**

SKLAR WILLIAMS PLLC

By: /s/ Frank M. Flansburg III
FRANK M. FLANSBURG III, ESQ.
MAXIMILIEN D. FETAZ, ESQ.
EMILY L. DYER, ESQ.

By: /s/ Stephen R. Hackett
STEPHEN R. HACKETT, ESQ.
Nevada Bar No. 5010
shackett@sklar-law.com
410 S. Rampart Blvd., Suite 350
Las Vegas, NV 89144
Telephone: 702.360.6000
Facsimile: 702.360.0000

**ARNOLD & PORTER KAYE
SCHOLER LLP**
AARON F. MINER, ESQ.
(*pro hac vice*)
SASHA ZHENG, ESQ.
(*pro hac vice*)
ANDREW C. JOHNSON, ESQ.
(*pro hac vice*)
KELLEY CHANGFONG-HAGEN, ESQ.
(*pro hac vice*)
AIDAN MULRY, ESQ.
(*pro hac vice*)

*Attorney for Defendants Zhou Min Ni; Fai
Lam, in his capacity as Trustee of The
Irrevocable Trust for Raymond Ni; Weihui
Kwok; Yuanyuan Wu and Maodong Xu*

Attorneys for Plaintiff HF Foods Group, Inc.

IT IS SO ORDERED.


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: August 17, 2023

¹ Plaintiff and Mr. Lam, Mr. Kwok, and Ms. Wu filed a stipulation to extend the deadline to answer the Complaint on June 14, 2023 (ECF 47), which was denied without prejudice for failing to state the reason for the requested extension under LR IA 6-1(a). ECF 48.